

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-11534-MAP

NELSON R. ROUETTE AND
JAY NEARIS,

Plaintiffs and
Counterclaim Defendants

vs.

MACHINE & ELECTRICAL
CONSULTANTS, INC., FABIEN DUBE,
AND NORM CREPEAU,

Defendants and
Counterclaim Plaintiffs

MACHINE & ELECTRICAL
CONSULTANTS, INC.

Third-Party Plaintiff

vs.

QUALITY MACHINE SOLUTIONS,
INC.

Third-Party Defendant

**JOINT MOTION TO EXTEND
DISCOVERY DEADLINE**

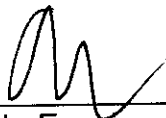
NOW COME the parties, and hereby request that the Court extend the Discovery Deadline in the above referenced matter, which is presently scheduled to expire on June 1, 2005, up to and including October 1, 2005.

AS REASONS THEREFORE, the parties represent to the Court that they are diligently attempting to finalize paper discovery. This matter involves the production of voluminous business records, which the parties have been attempting in good faith to

resolve the disputes concerning their production without involvement of the Court. The parties envision that paper discovery, absent motion to compel, could be completed within thirty (30) days. Upon completion, the parties request approximately three months to complete the necessary depositions.

WHEREFORE, the parties respectfully request that this Court extend the Discovery Deadline up to and including October 1, 2005 and reschedule the case management conference currently scheduled for June 7, 2005, to a convenient date in October of 2005 for the Court.

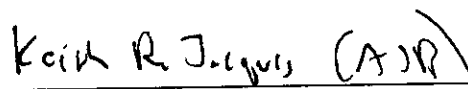
The Plaintiffs,
Nelson Rouette, Jay Nearis and QMS,
By Their Attorney,



Adam J. Basch, Esquire
Bacon & Wilson, P.C.
33 State Street
Springfield, MA 01103
Ph: (413) 781-0560
Fax: (413) 739-7740
BBO# 655482
May 5, 2005

382908

The Defendants,
Machine & Electrical Consultants,
By Their Attorney,



Keith R. Jacques, Esquire
Smith Elliot Smith & Garmey, P.A.
199 Main Street
P.O. Box 1179
Saco, ME 04072
Ph: (207) 282-1527
Fax: (207) 283-4412
May 5, 2005